## THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 20-221
	)	
VS.	)	
	)	
IORDAN COVNE	)	

## POSITION OF THE DEFENDANT WITH RESPECT TO SENTENCING FACTORS

Counsel for the Defendant has received and reviewed the Presentence Report (PSR) and has conferred with the Defendant regarding the content of same. The Defendant requests that the following additional paragraphs be added to the Mental and Emotional Health section of the PSR:

After his change of plea in this case, and as the date of his sentencing approached, Mr. Coyne's mental health condition worsened, culminating in a suicide attempt on June 6, 2022 for which he was briefly hospitalized. The June 6, 2022 suicide attempt caused a significant injury to the tendons of his left-hand requiring surgery to repair.

On June 13, 2022, Mr. Coyne sought treatment at Western Psych for his continuing deteriorating mental health condition, which resulted in his being admitted into a partial hospitalization program in the UPMC Bellefield Adult Intensive Outpatient Program.

Records of his past and most recent Mental Health treatment will be attached.

Prior to sentencing, the Defendant will provide Mr. Coyne's past and most recent mental health treatment records to the probation officer to be added as part of the PSR, so that the medical facility at his FCI will have accurate background information to deal with any mental health issues which arise as he serves his 18-month sentence.

FPO Wilson advised counsel by email on September 30, 2022 that he will include the additional information suggested herein in the PSR, and will have his office attach any medical records to the PSR sent to him in PDF form.

Mr. Coyne has no other objections or requests for modification of the remaining content of the PSR.

Respectfully submitted,

/s/ William J. McCabe 11 North Main Street Greensburg, PA 15601 PA ID No. 32618 (724) 836-0700 Attorney for Defendant